# KAPLAN HECKER & FINK LLP

November 5, 2021

**VIA ECF**

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

> Re:   *In re Columbia University Tuition Refund Action*,
>        Lead Case No. 1:20-cv-03208 (JMF) (S.D.N.Y.)

Dear Judge Furman:

We represent defendant The Trustees of Columbia University in the City of New York ("Columbia" or the "University") in the above-captioned action. With Plaintiffs' consent, we write to respectfully request an extension of the deadline to file the preliminary approval motion in support of the parties' proposed class action settlement, which is currently due November 10, 2021. (ECF 81.)

The parties have been working diligently to come to a satisfactory settlement agreement and draft the necessary papers for a preliminary approval motion. While significant progress has been made, the parties require more time to complete all of the necessary documents for such a filing. There are a number of different factors to be considered and addressed, and mechanics to be worked out, when structuring notice and refunds to approximately 30,000 current and former students in close to 20 different schools within the University.[1]

Accordingly, the parties respectfully request an extension of the deadline for the preliminary approval motion in support of the parties' proposed class action settlement from November 10 to November 23, 2021. No prior extension of this deadline has been requested.

Respectfully submitted,

Gabrielle E. Tenzer

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[1]   Additionally, Columbia's lead counsel has been on trial since October 25, representing plaintiffs who are pursuing claims against the organizers of the Unite the Right rally that took place in Charlottesville, Virginia, in 2017. *See Sines v. Kessler*, 3:17-cv-00072 (W.D. Va.).